

May 14, 2026

Ministry of Municipal Affairs and Housing
777 Bay St,
17th Floor
Toronto, ON
M7A 2J3

Submitted Electronically

RE: ERO 026-0300, Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes (Schedules 1, 2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026)

Hydro One Networks Inc. (“Hydro One”) is Ontario’s largest electricity transmission and distribution provider. We connect virtually every home and business in the province with our 30,000 km long transmission network. Our 126,000 kms of distribution infrastructure provides over 1.5 million customers with safe, reliable and affordable electricity. As the connecting link bringing Ontario’s energy system together, we are a key partner in enabling the province’s Integrated Energy Plan.

We strongly support standardizing municipal official plans provided they require municipalities to provide accurate growth plans to local distribution companies (LDCs) to enable accurate forecasting of growing electricity capacity needs. By engaging LDCs and Hydro One early in municipal planning processes, municipalities can help to ensure electricity is available when and where it is needed to support local and provincial housing, economic, and infrastructure development, and advance key transportation and transit priorities.

Critical information requirements for LDCs to accurately forecast growth

The most critical information that Hydro One and other LDCs require is municipal growth forecasts that outline the number and type of residential units, heating source if known, acreage of commercial and industrial land, location, timeline, and confidence level for each item. Additionally, Hydro One has found that constraints from other public utilities, such as water, have the greatest impact on electrical development timelines, since the planning and construction of electricity infrastructure must be coordinated with these other utilities. These constraints must be communicated to the servicing LDC so that efforts can be directed to areas that are ready for electricity planning and growth.

These forecasts are important because they enable upstream grid investments, such as new distribution and transmission stations, which require close

Hydro One Networks Inc.

483 Bay Street
8th Floor South Tower
Toronto, Ontario M5G 2P5

HydroOne.com

Raegan Bond, Director,
Energy Policy, Hydro One

T:437-778-3685

Raegan.Bond@hydroone.com

coordination with municipalities to secure land well in advance to avoid delays and take time to move from the planning stage to the construction stage. This coordination will become increasingly critical as Ontario's electricity demand is projected to grow at unprecedented rates through 2050, necessitating a substantial increase in the number of new distribution stations constructed each year.

In addition to providing LDCs with accurate forecasting, incorporating the above information into standardized official plans will ensure municipal planners coordinate with relevant servicing LDCs early in the process. Hydro One has found that municipalities are often brought into the planning process much later than is ideal. Earlier coordination would help avoid delays that frustrate developers, businesses, and homeowners.

Increase flexibility of Land Use Designations to support the development of distribution stations

Under the proposed A3 Land Use Designations, Hydro One recommends giving distribution stations maximum flexibility and not restricting them to industrial zoning areas. When distribution stations are far from planned development areas, a longer feeder is needed to deliver capacity back to the development area, which drives up costs and reduces reliability of supply due to increased feeder exposure.

Hydro One appreciates the opportunity to provide comments and remains committed to working closely with municipalities to meet their needs and support the growth of Ontario's economy.

Sincerely,

A handwritten signature in cursive script that reads "Raegan Bond".

Raegan Bond
Director, Energy Policy, Hydro One